

EXHIBIT 3

From: Connie Dai <connie@lionslawgroup.com>
Sent: Thursday, January 30, 2025 1:20 PM
To: Theodore J. Folkman; Michele E. Connolly; Robin Quinn; Tim Cutler
Cc: Peter E. Ball; Malgorzata A. Mrózek; Yun Cheng
Subject: Re: [EXTERNAL] Sunco Timber (Kunshan) Co. Ltd. v. Linda Sun, et. al.

WARNING: This message is from an external email address.

Ted, Mr. Wu has not applied visa. Like I started in the last email, client prefers to take the deposition by remote means. Connie

From: Theodore J. Folkman
Sent: Tuesday, January 28, 2025 8:45 PM
To: Connie Dai ; Michele E. Connolly ; Robin Quinn ; Tim Cutler
Cc: Peter E. Ball ; Malgorzata A. Mrózek ; Yun Cheng
Subject: RE: [EXTERNAL] Sunco Timber (Kunshan) Co. Ltd. v. Linda Sun, et. al.

Hi, Connie,
Can you let me know whether Mr. Wu applied for a visa, and if so, when?
Thanks,
Ted

From: Connie Dai
Sent: Thursday, January 23, 2025 1:14 PM
To: Michele E. Connolly ; Robin Quinn ; Tim Cutler
Cc: Theodore J. Folkman ; Peter E. Ball ; Malgorzata A. Mrózek ; Yun Cheng
Subject: Re: [EXTERNAL] Sunco Timber (Kunshan) Co. Ltd. v. Linda Sun, et. al.
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Hi Michele,
Only 4 people are current employees of Sunco China. Our client has no control of former employees. The current employees are: Giongiong Wu, Wenjing Sun, Bing Zhao and Ruihua Xiao. Mr. Ruihua Xiao is in a very senior age and in a poor physical condition, he will be unable to attend any form of deposition. As for the depo of Wu, Sun and Zhao, it would be burdensome and not practical for them to be deposed in person in February. The waiting period for the visa interviews is estimated to be at least a few months, and it has apparently become unpredicted/worse after the new administration came to office on Monday. The deponents, however, willing to be deposed by remote means in China or Hong Kong if necessary. As you may know, Chinese laws require certain steps be taken for its citizen to be deposed by foreign lawyers. Hong Kong or Mocow is less stringent.
Assuming remote means are used, it usually be conducted for evening/night times in China and our times in the morning. Time difference is 13 hours, Beijing's 8 PM is our 7 AM on the same day. As for scheduling, I apologize that three deponents are proposing different dates/times than you scheduled:

2/18, 19, 21, 25, 26, 3/3, 3/4, 3/5, and 3/6. Please let us know what dates fit your and the interpreter's schedules.

We are okay with combining the individual and 30b6 depositions. We can identify the deponent(s) as the designee(s) once receiving your 30b6 notice and understanding the scope thereof.

If you'd like to discuss about it, be happy to jump on a call.

Best,

Connie

From: Michele E. Connolly

Sent: Tuesday, January 21, 2025 5:51 PM

To: Robin Quinn ; Tim Cutler

Cc: Theodore J. Folkman ; Connie Dai ; Peter E. Ball ; Malgorzata A. Mrózek ; Yun Cheng

Subject: Re: [EXTERNAL] Sunco Timber (Kunshan) Co. Ltd. v. Linda Sun, et. al.

Tim,

I write in response to your letter of last Friday, January 17, concerning deposition scheduling. You noted that you are working through issues of legality of taking depositions in China. I assume you are referring to the depositions of Bing Zhao, Jianxiao Yu, and Xiaogong Wang inasmuch as the deposition notices of those three individuals indicated their depositions were to be by videoconference. Of course, we would welcome conducting their depositions in person at our office, but we presume it would be more convenient for the witnesses to have their depositions conducted by videoconference (i.e., Zoom) and, due to their lesser significance in the case, we are willing to forgo having them appear in person.

The deposition notices for Guoqing Wu, Qiong Xiao, Ruihua Xiao, Wenjing Sun, and Yueyon Gao all indicated in-person depositions to be conducted at our firm's office. There should, therefore, be no issue with the legality of depositions in China with respect to those witnesses. Yueyon Gao and Wenjin Sun are currently scheduled to be deposed two weeks from today, so please let me know as soon as possible, and in any event no later than the end of this week, whether those individuals will not appear at our Boston office on the dates noticed. There is considerable effort and expense involved in locating and reserving a qualified interpreter.

Also, we expect to be serving our Fed.R.Civ.P.30(b)(6) shortly. If any of the witnesses whom we have previously designated will also be serving as Rule 30(b)(6) witnesses, we are willing to combine the 30(b)(6) deposition with the individual deposition(s) assuming you are willing to do the same for the defendants whom we represent.

Finally, you indicated in your letter that you will be "updating" your client's 30(b)(6) notices. We have looked through our records and cannot find any previously served 30(b)(6) notices. Our apologies if we have missed them. Please send those original notices, or another copy of those notices if you have already sent them, as soon as possible. Without the 30(b)(6) notices, we cannot be certain who will be the designee, although we anticipate that David Sun is likely to be the designee for many, if not all, of the topics we expect will likely be included in your client's notices. You also indicated that you will re-issue your notices of deposition for our individual clients. We also do not have a record of those notices. Please re-send whatever notices you previously sent or believe that you previously sent.

Thank you.

Best,
Michele

Michele E. Connolly | Partner

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On Jan 17, 2025, at 1:24 PM, Robin Quinn wrote:

Hi All,

Please see the attached letter from Tim answering your questions below.

Thank you,

Robin

Robin Quinn

Senior Paralegal

CUTLER & WILENSKY LLP

20 Walnut Street, Suite 1

Wellesley, Massachusetts 02481

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From: Theodore J. Folkman <TFolkman@rubinrudman.com>

Sent: Thursday, January 16, 2025 8:24 PM

To: Michele E. Connolly <mec@fitchlp.com>; Tim Cutler <tim@cutlerlegal.com>; Connie Dai <connie@lionslawgroup.com>

Cc: Peter E. Ball <peb@fitchlp.com>; Malgorzata A. Mrózek <mam@fitchlp.com>; Yun Cheng <yun@lionslawgroup.com>; Robin Quinn <robin@cutlerlegal.com>

Subject: RE: [EXTERNAL] Re: Sunco Timber (Kunshan) Co. Ltd. v. Linda Sun, et. al.

Dear Tim and Connie,

It would be helpful if you could also answer these questions for the Wu deposition also.

Thank you!

Ted

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From: Michele E. Connolly <mec@fitchlp.com>
Date: Thursday, Jan 16, 2025 at 10:23 AM
To: Tim Cutler <tim@cutlerlegal.com>, Connie Dai <connie@lionslawgroup.com>
Cc: Peter E. Ball <peb@fitchlp.com>, Malgorzata A. Mrózek <mam@fitchlp.com>, Theodore J. Folkman <TFolkman@rubinrudman.com>, Yun Cheng <yun@lionslawgroup.com>, Robin Quinn <robin@cutlerlegal.com>
Subject: [EXTERNAL] Re: Sunco Timber (Kunshan) Co. Ltd. v. Linda Sun, et. al.
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Tim, Connie, and Michael,

I write to discuss deposition scheduling. Last month, we noticed the depositions of 7 witnesses. In my cover email below, I stated that we are happy to discuss mutually convenient dates and times. The date of the first noticed deposition, of Yueyon Gao, is now just three weeks away (February 4, in person). Will you be providing alternative dates for those witnesses, or should we plan to depose them on the dates in the notices?

If you do not intend to make the witnesses available on the dates in the various notices and by the manner in the various notices (i.e., in person if the notice calls for an in person deposition or by Zoom if the notice calls for Zoom) and do not intend to offer alternative dates, please let me know as soon as possible so that we can schedule a meet-and-confer under the Local Rules. As you know, fact discovery is set to close in just two months, so if we need to seek relief from the Court, we intend to do so quickly.

Thank you.

Best,

Michele

Michele E. Connolly | Partner

Phone 617-542-5542

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mec@fitchlp.com | [View Bio](#)

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On Dec 18, 2024, at 3:54 PM, Michele E. Connolly <mec@fitchlp.com> wrote:

Tim and Connie,

Please see the attached notices of deposition. These notices just contain placeholder dates for now, as we are happy to discuss mutually convenient dates and times. Please let us know the witnesses' availability.

Thank you.

Best,
Michele

On Dec 18, 2024, at 3:27 PM, Michele E. Connolly <mec@fitchlp.com> wrote:

Tim and Connie,

Please see the attached.

Thank you.

Best,
Michele

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